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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03 MDL 1570

This document relates to:

Estate of John P. O'Neill, Sr., et al v. Al Baraka Inv. & Dev. Corp., et al, 04-CV-1923
(RCC)

Estate of John P. O'Neill, Sr., et. al v. Republic of Iraq, et. al., 04- CV- 1076 (RCC)

STIPULATED EXTENSION
OF TIME IN WHICH TO FILE REPLY

TO THE HONORABLE COURT:

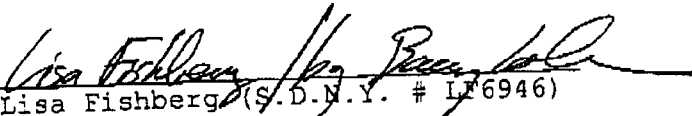
NOW APPEAR, without submitting to the jurisdiction of this Court, Martin Wachter, Erwin Wachter, Secor Treuhand Anstalt, and Asat Trust Reg., by and through the undersigned counsel, along with the undersigned counsel representing the Plaintiffs in these matters, and respectfully stipulate and agree to, subject to the approval of this Court, as follows:

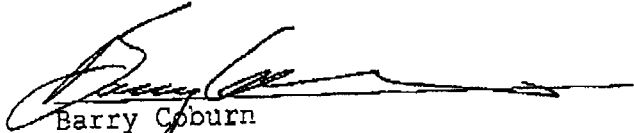
1. On or about August 1, 2005, Martin Wachter, Erwin Wachter, Secor Treuhand Anstalt, and Asat Trust Reg. ("Stipulating Defendants") filed a motion to dismiss the claims against them pursuant to Fed. R. Civ. P. 12 (b)(5) for insufficiency of service of process and Fed. R. Civ. P. 12 (b)(2) for lack of personal jurisdiction.

2. In accordance with the stipulated schedule approved by the court, Plaintiffs filed their opposition to the motion on September 14, 2005. The opposition, with its appendices and exhibits was 40 pages long, and the table of authorities alone covered four pages. In light of the length and complexity of the pleading, counsel for Stipulating Defendants require additional time in which to reply.

3. Under the terms of the previous stipulation, Defendants' reply would be due on October 14, 2005, a date when counsel for defendants are also bound to file an appellate brief in another matter. In light of these circumstances, the Stipulating Defendants require an additional ten days, that is until October 24, 2005, to file their reply, and Plaintiffs do not oppose the grant of this additional time.

RESPECTFULLY SUBMITTED this 22nd day of September, 2005.


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And


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ATTORNEYS FOR PLAINTIFFS

So ordered this 23 day of September 2005.



Hon. Richard C. Casey,
United States District Court Judge

